

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

STRAGENT, LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 20-510-LPS
	)	
BMW OF NORTH AMERICA, LLC, and	)	
BMW MANUFACTURING CO., LLC,	)	
	)	
Defendants.	)	
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STRAGENT, LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 20-511-LPS
	)	
MERCEDES-BENZ USA, LLC,	)	
MERCEDES-BENZ VANS, LLC, DAIMLER	)	
TRUCKS NORTH AMERICA, LLC, and DAIMLER	)	
NORTH AMERICA CORPORATION,	)	
	)	
Defendants.	)	
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STRAGENT, LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 20-512-LPS
	)	
VOLVO CAR NORTH AMERICA, LLC,	)	
	)	
Defendant.	)	
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**DEFENDANTS' MOTION TO DISMISS**

Defendants BMW of North America, LLC and BMW Manufacturing Co., LLC (“BMW”); Mercedes-Benz USA, LLC (“MBUSA”), Mercedes-Benz Vans, LLC (“MBV”), Daimler Trucks North America, LLC (“DTNA”), and Daimler North America Corp. (“DNAC”)

(collectively, “Mercedes”); and Volvo Car North America, LLC (“Volvo”) (collectively, “Defendants”) hereby respectfully move, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, to dismiss Stragent’s complaints for patent infringement of U.S. Patent Nos. 10,248,477; 10,031,790; 10,002,036; and 9,705,765 as barred by claim and issue preclusion. The grounds for this motion are fully set forth in the accompanying opening brief.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

*/s/ Jack B. Blumenfeld*

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July 6, 2020

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LLC, Mercedes-Benz Vans, LLC, Daimler  
Trucks North America, LLC and Daimler  
North America Corp.*

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MERCEDES-BENZ VANS, LLC, DAIMLER	)	
TRUCKS NORTH AMERICA, LLC, and DAIMLER	)	
NORTH AMERICA CORPORATION,	)	
	)	
Defendants.	)	
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STRAGENT, LLC,	)	
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Plaintiff,	)	
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v.	)	C.A. No. 20-512-LPS
	)	
VOLVO CAR NORTH AMERICA, LLC,	)	
	)	
Defendant.	)	
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**[PROPOSED] ORDER**

This \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_, Defendants BMW of North America, LLC and BMW Manufacturing Co., LLC (“BMW”); Mercedes-Benz USA, LLC (“MBUSA”), Mercedes-Benz Vans, LLC (“MBV”), Daimler Trucks North America, LLC (“DTNA”), and Daimler North

America Corp. (“DNAC”) (collectively, “Mercedes”); and Volvo Car North America, LLC (“Volvo”) (collectively, “Defendants”), having moved to dismiss Stragent’s complaints for patent infringement of U.S. Patent Nos. 10,248,477; 10,031,790; 10,002,036; and 9,705,765 in the above actions pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure as barred by claim and issue preclusion, and the Court having concluded that good grounds exist for the requested relief; now therefore,

IT IS HEREBY ORDERED that Defendants’ motion is granted, and that Stragent’s complaints are dismissed with prejudice pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure as barred by claim and issue preclusion.

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UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on July 6, 2020, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on July 6, 2020, upon the following in the manner indicated:

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*/s/ Jack B. Blumenfeld*

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Jack B. Blumenfeld (#1014)